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NEVADA CORPORATE HEADQUARTERS
and JASON WILLIAMS

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEVADA CORPORATE HEADQUARTERS,
A Nevada Corporation

Plaintiff,

vs.

JANETTE M. HILL; JOHN DOE;
ATTORNEY DOE; and DOES I through X and
ROE Corporations or Business Entities I
through X, inclusive,

Defendants.

JANETTE M. HILL, individually,

Counterclaimant,

vs.

NEVADA CORPORATE HEADQUARTERS,
A Nevada Corporation, JASON WILLIAMS,
individually, ALFONSO VALLE, individually,

Counter-Defendant.

Case No.: 20-CV-01721-RFB-VCF

**STIPULATION TO EXTEND DEADLINE
FOR PLAINTIFF AND
COUNTERDEFENDANTS TO RESPOND
TO DEFENDANT AND
COUNTERCLAIMANT'S AMENDED
COUNTERCLAIM**

1 IT IS HEREBY STIPULATED by and between Plaintiff/Counterdefendant NEVADA
2 CORPORATE HEADQUARTERS (“Plaintiff” and “Counterdefendant”) and JASON
3 WILLIAMS (“Counterdefendant”), through their counsel of record and
4 Defendant/Counterclaimant JANETTE M. HILL by and through her counsel of record that
5 Counter-Defendants shall have an extension up to and including October 29, 2020, in which to
6 file its response to Defendant/Counterclaimant’s Counterclaim. This Stipulation is submitted and
7 based upon the following:

8 1. Plaintiff/Counterdefendants filed a Removal of Defendant/Counterclaimant’s
9 Counterclaim on September 16, 2020. ECF No. 1. Defendant/Counterclaimant was served with
10 the Notice of Removal September 16, 2020. ECF No. 1.

11 2. Defendant/Counterclaimant filed an Amended Counterclaim on October 1, 2020.
12 ECF 14. Plaintiffs/Counterdefendants’s response to the Amended Counterclaims is currently due
13 on October 15, 2020.

14 3. Due to the press of other matters, including a death in counsel’s family,
15 adjustments made necessary by the COVID-19 pandemic, and in order to fully respond to the
16 pleading, Plaintiff/Counterdefendants require additional time to respond to
17 Defendant/Counterclaimant’s Amended Counterclaim. Plaintiffs/Counterdefendants accordingly
18 requests an extension, up to and including October 29, 2020, to file its responsive pleading.

19 4. This is the first request for an extension of time for Plaintiffs/Counterdefendants to
20 file a response to Defendant/Counterclaimant’s Amended Counterclaim.

21 5. This request is made in good faith and not for the purpose of delay.

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6. Nothing in this Stipulation, nor the fact of entering to the same, shall be construed as waiving any claim and/or defense held by any party.

Dated this 14th day of October, 2020.

LAGOMARSINO LAW

JACKSON LEWIS P.C.

/s/ Andre M. Lagomarsino

/s/ Lisa A. McClane

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Attorneys for Plaintiff/Counterdefendants

ORDER

IT IS SO ORDERED.



U.S. Magistrate Judge

Dated: 10-15-2020

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I am an employee of Jackson Lewis P.C., and that on this 14th day of October, 2020, I caused to be served via the Court's CM/ECF Filing, a true and correct copy of the above foregoing **STIPULATION TO EXTEND DEADLINE FOR PLAINTIFF AND COUNTERDEFENDANTS TO RESPOND TO DEFENDANT AND COUNTERCLAIMANT'S AMENDED COUNTERCLAIM** properly addressed to the following:

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/s/ Mayela E. McArthur
Employee of Jackson Lewis P.C.

4851-4013-0510, v. 1